	Case 2:23-cv-01495-JHC	Document 358	Filed 11/25/24	Page 1 of 8
1				
2				
3				
4				
5	LIMITED	OT ATEC DICTO	NOT COURT	
6 7	UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE			
8			<u>r</u>	
9	FEDERAL TRADE COMMISSION	I, et al.,	CASE NO.: 2:23-0	ev-01495-JHC
10	Plaintiffs,		STIPULATED M	OTION AND
11	v.		ORDER	
12	AMAZON.COM, INC., a corporation	on,	NOTE ON MOTIC	
13	Defendant.		NOVEMBER 25, 2	2024
14				
15	The parties, by and through th	eir attorneys of re	cord, respectfully rec	quest that the Court
16	enter the proposed order set forth below. In support of this request, the parties represent the			es represent the
17	following to the Court:			
18	1. Amazon filed its Answ	ver to Plaintiffs' S	econd Amended Con	nplaint on November
19	14, 2024 (Dkt. #341).			
20	2. Pursuant to Federal Ru	ale of Civil Proced	lure 12(f), Plaintiffs'	deadline to file any
21		motion(s) to strike regarding Amazon's Answer to the Second Amended		
22	Complaint is December 5, 2024.			
23	3. The parties stipulate as follows, and jointly request that the Court enter the		Court enter the	
24	following order approv	ving this stipulatio	n:	
	STIPULATED MOTION AND ORDER - 1 CASE NO. 2:23-cv-01495-JHC			

1	a. Plaintiffs' deadline to file any motion(s) to strike in response to Amazon's
2	Answer shall be December 9, 2024.
3	b. Amazon's deadline to oppose any motion(s) to strike shall be January 10,
4	2025.
5	c. Plaintiffs' deadline to file a reply in support of any motion(s) to strike shall be
6	January 24, 2025.
7	
8	Stipulated to and respectfully submitted this 25th day of November, 2024, by:
9	s/ Danielle C. Quinn
10	SUSAN A. MUSSER (DC Bar # 1531486) EDWARD H. TAKASHIMA (DC Bar # 1001641)
11	DANIELLE C. QUINN (NY Reg. # 5408943) CATHLEEN WILLIAMS (MD Bar No Number)
12	Federal Trade Commission 600 Pennsylvania Avenue, NW
13	Washington, DC 20580 Tel.: (202) 326-2122 (Musser)
14	(202) 326-2464 (Takashima) Email: smusser@ftc.gov
15	etakashima@ftc.gov dquinn@ftc.gov cwilliams@ftc.gov
16	Attorneys for Plaintiff Federal Trade Commission
17	Attorneys for I tutnity I ederal Trade Commission
18	
19	
20	
21	
22 23	
23 24	
- -r	

STIPULATED MOTION AND ORDER - 2 CASE NO. 2:23-cv-01495-JHC

1	s/ Michael Jo	s/Timothy D. Smith
	Michael Jo (admitted <i>pro hac vice</i>)	Timothy D. Smith, WSBA No. 44583
2	Assistant Attorney General, Antitrust Bureau	Senior Assistant Attorney General
	New York State Office of the Attorney	Antitrust and False Claims Unit
3	General	Oregon Department of Justice
	28 Liberty Street	100 SW Market St
4	New York, NY 10005	Portland, OR 97201
	Telephone: (212) 416-6537	Telephone: (503) 934-4400
5	Email: Michael.Jo@ag.ny.gov	Email: tim.smith@doj.state.or.us
	Counsel for Plaintiff State of New York	Counsel for Plaintiff State of Oregon
6		
	s/ Rahul A. Darwar	s/Jennifer A. Thomson
7	Rahul A. Darwar (admitted <i>pro hac vice</i>)	Jennifer A. Thomson (admitted <i>pro hac vice</i>)
	Assistant Attorney General	Senior Deputy Attorney General
8	Office of the Attorney General of Connecticut	Pennsylvania Office of Attorney General
	165 Capitol Avenue	Strawberry Square, 14th Floor
9	Hartford, CT 06016	Harrisburg, PA 17120
	Telephone: (860) 808-5030	Telephone: (717) 787-4530
10	Email: Rahul.Darwar@ct.gov	Email: jthomson@attorneygeneral.gov
	Counsel for Plaintiff State of Connecticut	Counsel for Plaintiff Commonwealth of
11		Pennsylvania
	s/ Alexandra C. Sosnowski	
12	Alexandra C. Sosnowski (admitted <i>pro hac</i>	s/ Michael A. Undorf
	vice)	Michael A. Undorf (admitted <i>pro hac vice</i>)
13	Assistant Attorney General	Deputy Attorney General
	Consumer Protection and Antitrust Bureau	Delaware Department of Justice
14	New Hampshire Department of Justice	820 N. French St., 5th Floor
	Office of the Attorney General	Wilmington, DE 19801
15	One Granite Place South	Telephone: (302) 683-8816
	Concord, NH 03301	Email: michael.undorf@delaware.gov
16	Telephone: (603) 271-2678	Counsel for Plaintiff State of Delaware
	Email: Alexandra.c.sosnowski@doj.nh.gov	
17	Counsel for Plaintiff State of New Hampshire	s/Christina M. Moylan
	/P 1	Christina M. Moylan (admitted pro hac vice)
18	s/Robert J. Carlson	Assistant Attorney General
1.0	Robert J. Carlson (admitted <i>pro hac vice</i>)	Chief, Consumer Protection Division
19	Assistant Attorney General	Office of the Maine Attorney General
30	Consumer Protection Unit	6 State House Station
20	Office of the Oklahoma Attorney General	Augusta, ME 04333-0006
3.1	15 West 6th Street, Suite 1000	Telephone: (207) 626-8800
21	Tulsa, OK 74119	Email: christina.moylan@maine.gov
22	Telephone: (918) 581-2885	Counsel for Plaintiff State of Maine
22	Email: robert.carlson@oag.ok.gov	
22	Counsel for Plaintiff State of Oklahoma	
23		
24		
۷4		

STIPULATED MOTION AND ORDER - 3 CASE NO. 2:23-cv-01495-JHC

1	s/Schonette Jones Walker	s/ Lucas J. Tucker
	Schonette Jones Walker (admitted pro	Lucas J. Tucker (admitted pro hac vice)
2	hac vice)	Senior Deputy Attorney General
	Assistant Attorney General	Office of the Nevada Attorney General
3	Antitrust Division	100 N. Carson St.
	Office of the Attorney General	Carson City, NV 89701
4	200 Saint Paul Place	Telephone: (775) 684-1100
	Baltimore, Maryland 21202	Email: LTucker@ag.nv.gov
5	Telephone: (410) 576-6473	Counsel for Plaintiff State of Nevada
	swalker@oag.state.md.us	
6	Counsel for Plaintiff State of Maryland	s/ Andrew Esoldi
		Andrew Esoldi (admitted pro hac vice)
7	s/Katherine W. Krems	Deputy Attorney General
	Katherine W. Krems (admitted <i>pro hac vice</i>)	New Jersey Office of the Attorney General
8	Assistant Attorney General, Antitrust Division	124 Halsey Street, 5th Floor
	Office of the Massachusetts Attorney General	Newark, NJ 07101
9	One Ashburton Place, 18th Floor	Telephone: (973) 648-7819
	Boston, MA 02108	Email: andrew.esoldi@law.njoag.gov
10	Telephone: (617) 963-2189	Counsel for Plaintiff State of New Jersey
	Email: katherine.krems@mass.gov	
11	Counsel for Plaintiff Commonwealth of	s/ Jeffrey Herrera
	Massachusetts	Jeffrey Herrera (admitted pro hac vice)
12		Assistant Attorney General
	s/Scott A. Mertens	New Mexico Office of the Attorney General
13	Scott A. Mertens (admitted pro hac vice)	408 Galisteo St.
	Assistant Attorney General	Santa Fe, NM 87501
14	Michigan Department of Attorney General	Telephone: (505) 490-4878
	525 West Ottawa Street	Email: jherrera@nmag.gov
15	Lansing, MI 48933	Counsel for Plaintiff State of New Mexico
	Telephone: (517) 335-7622	/5.1. G
16	Email: MertensS@michigan.gov	s/Zulma Carrasquillo Almena
	Counsel for Plaintiff State of Michigan	Zulma Carrasquillo Almena (admitted <i>pro hac</i>
17	/7 1 D:	vice)
	s/ Zach Biesanz	Puerto Rico Department of Justice
18	Zach Biesanz (admitted pro hac vice)	P.O. Box 9020192
10	Senior Enforcement Counsel	San Juan, Puerto Rico 00902-0192
19	Office of the Minnesota Attorney General	Telephone: (787) 721-2900, Ext. 1211
30	445 Minnesota Street, Suite 1400	Email: zcarrasquillo@justicia.pr.gov
20	Saint Paul, MN 55101	Counsel for Plaintiff Commonwealth of Puerto
\ 1	Telephone: (651) 757-1257	Rico
21	Email: zach.biesanz@ag.state.mn.us	
22	Counsel for Plaintiff State of Minnesota	
22		
12		
23		
24		
∠ ' +		

STIPULATED MOTION AND ORDER - 4 CASE NO. 2:23-cv-01495-JHC

1	s/ Stephen N. Provazza
2	Stephen N. Provazza (admitted <i>pro hac vice</i>) Special Assistant Attorney General
2	Chief, Consumer and Economic Justice Unit
3	Department of the Attorney General 150 South Main Street
4	Providence, RI 02903
	Telephone: (401) 274-4400
5	Email: sprovazza@riag.ri.gov
6	Counsel for Plaintiff State of Rhode Island
O	s/ Sarah L.J. Aceves
7	Sarah L.J. Aceves (admitted <i>pro hac vice</i>)
0	Assistant Attorney General Public Protection Division
8	Vermont Attorney General's Office
9	109 State Street
-	Montpelier, VT 05609
10	Telephone: (802) 828-3170
1.1	Email: Sarah.Aceves@vermont.gov
11	Counsel for Plaintiff State of Vermont
12	<u>s/ Laura E. McFarlane</u>
	Laura E. McFarlane (admitted <i>pro hac vice</i>)
13	Assistant Attorney General
14	Wisconsin Department of Justice Post Office Box 7857
17	Madison, WI 53707-7857
15	Telephone: (608) 266-8911
	Email: mcfarlanele@doj.state.wi.us
16	Counsel for Plaintiff State of Wisconsin
17	
18	
19	
20	
21	
22	
23	
24	

STIPULATED MOTION AND ORDER - 5 CASE NO. 2:23-cv-01495-JHC

1	MORGAN, LEWIS & BOCKIUS LLP
2	By: <u>s/ Patty A. Eakes</u> Patty A. Eakes, WSBA #1888
3	Molly A. Terwilliger, WSBA #28449 1301 Second Avenue, Suite 2800
4	Seattle, WA 98101 Phone: (206) 274-6400
5	Email: patti.eakes@morganlewis.com molly.terwilliger@morganlewis.com
6	mony.terwiniger@morganiewis.com
7	WILLIAMS & CONNOLLY LLP
8	Heidi K. Hubbard (<i>pro hac vice</i>) John E. Schmidtlein (<i>pro hac vice</i>)
9	Kevin M. Hodges (pro hac vice) Jonathan B. Pitt (pro hac vice)
10	Carl R. Metz (pro hac vice) Carol J. Pruski (pro hac vice)
11	Katherine Trefz (pro hac vice) 680 Maine Avenue SW
12	Washington, DC 20024 Phone: (202) 434-5000
13	Email: hhubbard@wc.com
14	khodges@wc.com jpitt@wc.com cmetz@wc.com
15	cpruski@wc.com ktrefz@wc.com
16	Kireiz@wc.com
17	COVINGTON & BURLING LLP
18	Thomas O. Barnett (<i>pro hac vice</i>) Katherine Mitchell-Tombras (<i>pro hac vice</i>)
19	One CityCenter 850 Tenth Street, NW
20	Washington, DC 20001-4956
21	Phone: (202) 662-5407 Email: tbarnett@cov.com
22	kmitchelltombras@cov.com
23	
24	
l	

STIPULATED MOTION AND ORDER - 6 CASE NO. 2:23-cv-01495-JHC

WILKINSON STEKLOFF LLP Kosta S. Stojilkovic (pro hac vice) 2001 M Street NW, 10th Floor Washington, DC 20036 Phone: (202) 847-4045 Email: kstojilkovic@wilkinsonstekloff.com Attorneys for Defendant Amazon.com, Inc.

STIPULATED MOTION AND ORDER - 7 CASE NO. 2:23-cv-01495-JHC

1	ORDER
2	IT IS SO ORDERED.
3	DATED this 25th day of November, 2024.
4	
5	John H. Chun LINITED STATES DISTRICT HIDGE
6	UNITED STATES DISTRICT JUDGE
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	

STIPULATED MOTION AND ORDER - 8 CASE NO. 2:23-cv-01495-JHC